  <b>Nuclear Department Fleet Procedure</b>	FP-EC-ECP-01	Revision: 5
	Issue Date: 11/24/2009	
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Title: <b>Employee Concerns Program</b>		
Approval:  <b>John Mestad</b> Fleet Employee Concerns Program Manager		

INFORMATION USE
<ul style="list-style-type: none"><li>• Procedure should be available, but not necessarily at the work location.</li><li>• Procedure may be performed from memory.</li><li>• User remains responsible for procedure adherence.</li></ul>

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## **1.0 PURPOSE**

- 1.1** The purpose of this procedure is to implement Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, Nuclear Department Corporate Policy CP 0021, "Employee Concerns Program" at the Site level.
- 1.2** This procedure establishes the fundamental program elements of the fleet Employee Concerns Program (ECP) to provide an alternate method for concerns to be raised and addressed.

## **2.0 APPLICABILITY**

- 2.1** The ECP is a program that supports a Safety Conscious Work Environment by providing site workers with an alternative and independent avenue for raising nuclear safety concerns. The ECP is also available for employees to initially address workplace concerns. Typically, workplace concerns are not entered into the ECP but are referred to the appropriate department or the Employee Issues Resolution Process (known as the PEACH program) for resolution. However, the ECP program is NOT intended to circumvent the terms and conditions of any collective bargaining agreement, including contractual grievance and arbitration procedures, nor is the program established to resolve traditional human resource department concerns such as sexual harassment or other Title VII concerns.
- 2.2** Upon request from an employee, the Site ECP Manager will maintain confidentiality within the limitations of the law and track issues to resolution. Employees will be provided with a reprisal-free environment in which their concerns will be independently evaluated in a timely manner. The Site ECP Manager will periodically contact the employee during the course of the investigation and will communicate results of the investigation directly to the employee.
- 2.3** The program is designed and administered in a manner intended to:
1. Promote a Safety-Conscious Work Environment (SCWE) where employees are free to raise concerns without fear of reprisal.
  2. Protect the identity of the individual bringing the concern (Concerned Individual).
  3. Permit multiple methods of contact.
  4. Alert senior management of concerns related to harassment and/or insults of the investigation directly to the employee.
  5. Provide timely feedback to concerned individuals.
  6. Provide effective corrective actions when appropriate.

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7. Periodically inform senior management of NSPM's performance in this area by the creation, maintenance, and communication of performance indicators.
8. Assist in compliance with 10 CFR 50.7, Employee Protection.

**2.4** This program does NOT affect the site worker's statutory right to pursue concerns through any government agency having jurisdiction such as the Nuclear Regulatory Commission (NRC), Department of Labor (DOL), Occupational Health and Safety Administration (OHSA), or others.

## **3.0 RESPONSIBILITIES**

### **3.1 NSPM Fleet ECP Manager**

1. Oversee and support the implementation of Employee Concerns Programs at NSPM nuclear sites.
2. Provide direction for the implementation of the Employee Concerns Program through procedures, directives or guidelines, as practical and appropriate.
3. Inform NSPM Nuclear Department CNO upon receipt of concerns relating to harassment, intimidation, retaliation or discrimination for engaging in protected activities.
4. Notify NSPM Safety Concerns Committee (SCC) of significant ECP concerns.
5. Provide initial and continuing training opportunities for ECP related activities to the NSPM staff.
6. Facilitate the investigation and resolution of Nuclear Regulatory Commission (NRC) allegations that are referred to the NSPM.
7. Maintain ECP Hotline and Fleet-wide contact methods (i.e., email, exit process, etc.)

### **3.2 Site Employee Concerns Program Managers**

1. Provide periodic reports of ECP-related activities to the NSPM Fleet ECP Manager and on-site managers.
2. Implement the site ECP consistent with the NSPM Nuclear Department Corporate Policy CP 0021, "Employee Concerns Program."
3. Receive nuclear safety concerns and workplace concerns submitted directly from site workers, external agencies, and other managers.

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4. Investigate nuclear safety concerns.
5. Refer ECP workplace concerns (i.e. non-nuclear safety concerns) to the appropriate department or PEACH process for resolution.
6. Actively promote the ECP so that all site workers are aware of how to use it.
7. Provide the ECP form "Nuclear Safety/Ethical Financial Practices Questionnaire," or similar form, to departing employees so that they have another opportunity to raise concerns prior to leaving the site.
8. Alert the NSPM Fleet ECP Manager and site senior management upon receiving a concern related to harassment, intimidation, retaliation or discrimination for engaging in protected activities.
9. Maintain ECP knowledge of industry's best practices.
10. Conduct interviews with concerned individuals and other sources of information.
11. Generate and distribute performance indicators that track ECP performance.
12. Document all nuclear safety concerns and workplace concerns brought to the ECP.
13. Maintain files and records in accordance with best industry practices from a security and retention standpoint.
14. Facilitate the investigation of nuclear safety concerns by utilizing appropriately trained and qualified individuals, as needed, to assist in the investigation of those concerns.
15. Provide training as needed for technical specialists to promote effective issue investigation.
16. Evaluate concerns using appropriate methods and industry-approved techniques.
17. Record relevant information regarding nuclear safety concerns brought to the ECP.
18. Assign a unique identification log number to each nuclear safety concern or workplace concern brought to the ECP.
19. Utilize existing site programs such as the corrective action program to identify and track corrective actions generated as a result of ECP investigations.
20. Work with the Concerned Individual (CI) to achieve a successful resolution to the concern whenever possible.

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21. Provide the CI with a Post-Use ECP Customer Evaluation Survey to complete and return to the NSPM Fleet ECP Manager.
22. Conduct a “Lessons Learned” review as needed to capture investigation shortcomings
23. Facilitate investigations and provide investigation reports as requested by the NSPM Fleet ECP Manager for site-specific issues referred to NSPM via the NRC.
24. Support site ECP-related training

### **3.3** Technical Specialists/Investigators/Reviewers

1. Provide technical assistance to the Site ECP Manager as requested by Site ECP Managers or the NSPM Fleet ECP Manager.
2. Maintain information related to the investigation of concerns, including the identity of the CI, in confidence and secure from unauthorized access.

### **3.4** All managers and supervisors

1. Openly solicit employee input and identification of concerns.
2. Address the concerns of their workers and those that are referred to them by the Site ECP Manager or NSPM Fleet ECP Manager.
3. Maintain a Safety Conscious Work Environment (SCWE) where employees are free to raise work related concerns without fear of reprisal.
4. Make available to site workers exiting NSPM, the opportunity to complete the ECP form “NSPM Nuclear Safety/Ethical Financial Practices Questionnaire” or similar form.

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## 4.0 DEFINITIONS

- 4.1 Nuclear Safety Concern:** Any concern relating to operational or quality issues, compliance with regulations, and/or harassment, intimidation, retaliation or discrimination for raising such concerns.
- 4.2 Workplace Concern:** A concern that does not involve nuclear safety. Examples include racial or sexual discrimination or harassment, illegal or unethical business practices, disputes involving performance reviews, compensation concerns or complaints about coworker behavior.
- 4.3 Site Worker:** Any person employed by NSPM, the parent utility, or a contractor, working at an NSPM member site or performing duties supporting licensed activities.

## 5.0 REQUIREMENTS

### 5.1 RAISING CONCERNS TO THE EMPLOYEE CONCERNS PROGRAM

#### 5.1.1 Methods of Raising Concerns

Site workers are provided with numerous methods to raise concerns to the Site ECP Manager or the NSPM Fleet ECP Manager. These methods include, but are not limited to, the following:

1. Direct telephone numbers
2. Company email
3. Secure Fax
4. Face-to-face meetings at NSPM Sites or, by prior arrangement, at an offsite location.
5. NSPM ECP Hotline
6. ECP Nuclear Safety/Ethical Financial Practices Questionnaire
7. US Mail

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### **5.1.2 Anonymous Concerns**

1. Site workers may submit a nuclear safety concern to the ECP on an anonymous basis, i.e., without disclosure of their name to the ECP Manager. In such situations, the CI should provide sufficient information for the ECP Manager to evaluate the concern.
2. Anonymous submission of a nuclear safety concern is NOT a preferred method of issue resolution. Anonymous submission makes it difficult to determine the details of an event, the appropriate scope of investigation, and confounds effective feedback. However, the ECP Manager, will investigate anonymous submissions and provide a response within these limitations.

## **5.2 THRESHOLD OF ISSUES**

**5.2.1** There is no threshold of concern that may be submitted to the ECP.

**5.2.2** Not all issues brought to the attention of the Site ECP Manager or NSPM Fleet ECP Manager will be formally tracked as directed by this procedure.

1. Typically, workplace concerns are not entered into the ECP formal process but are referred to the appropriate department or PEACH process for resolution. Refer to Attachment 2, Workplace Concern Resolution Flow Chart.

## **5.3 CONCERN TRACKING AND ECP STATUS REPORTING**

**5.3.1** Site ECP Managers SHALL:

1. Sequentially number all nuclear safety concerns that come into the Program.
2. Periodically report to the NSPM Fleet ECP Manager the status of nuclear safety concerns.
3. The Site ECP Manager will periodically report on the volume of workplace concerns to the NSPM Fleet ECP Manager as a general indicator of the health of the Site's Safety Conscious Work Environment.
4. Promptly notify the NSPM Fleet ECP Manager of all new nuclear safety concerns. The exception to notifying and reporting nuclear safety concerns to the NSPM Fleet ECP Manager is if the concern relates to the conduct of the NSPM Fleet ECP Manager. In this instance, the Site ECP Manager SHALL promptly notify the NSPM Vice President Operations Support of the concern, **not** the NSPM Fleet ECP Manager.



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**5.3.2** The Site ECP Manager should:

1. Work with the Site Vice President to provide site management team with insights regarding the cultural health of the site organization and
2. Identify issues for site management attention regarding developing undercurrents and trends that might adversely impact the site Safety Conscious Work Environment.

**5.4 TIMELINESS OF RESPONSE**

**5.4.1** The ECP should facilitate a timely, effective and respectful resolution to all nuclear safety concerns.

1. Nuclear safety concerns should be fully investigated within 30 days of receiving the concern. There may be cases where a concern may take longer than 30 days to complete the investigation due to the complexity of the concern or the number of issues involved with the concern.
2. Workplace concerns should be addressed in a timely manner that is agreeable by the concern individual.
3. Concerns that are raised via methods other than face-to-face should be acknowledged within one business day of receipt.

**5.4.2** Based on the results of each individual investigation, corrective actions may be assigned that will extend beyond these time periods. These corrective actions should be completed in a time period commensurate with their safety significance.

**5.4.3** The Site ECP Manager should establish interim feedback periodicity with the CI.

**5.5 CONFIDENTIALITY**

<b>NOTE:</b>	While the program is designed and administered in a manner intended to maintain confidentiality, it is important that all concerned individuals understand that the act of investigating a concern may inadvertently provide sufficient information from which other personnel might determine their identity.
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**5.5.1** The ECP SHALL be administered in a manner that maintains the employees' confidentiality to the maximum extent practical, as permitted by law.

1. When a nuclear safety concern is submitted to the ECP, the ECP form "Confidentiality Preference Agreement" should be completed to determine and document the CI's expectation regarding confidentiality, as appropriate.

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2. If the CI requests confidentiality (selecting Option I on the Confidentiality Preference Statement), information pertaining to the investigation and the CI SHALL be handled in a confidential manner and SHALL only be shared on a “need to know” basis.
3. The ECP Manager may consider the CI to have waived the right to confidentiality if the CI takes any action that would be reasonably expected to disclose his/her identity.
4. The CI’s identity may also be disclosed if immediate nuclear safety would be compromised if the confidential information was withheld. Such disclosure SHALL be made only with the prior approval of the NSPM Fleet ECP Manager.

## **5.6 OPERABILITY AND REPORTABILITY**

- 5.6.1 When issues raised to the ECP are deviations from performance expectations, including conditions adverse to quality, the ECP Manager should apply the guidance of FP-PA-ARP-01, CAP Action Request Process.
- 5.6.2 When issues raised to the ECP might affect operability or functionality of a system, structure or component (SSC) or are considered by the ECP Manager to potentially be reportable to the NRC as required by 10 CFR 50.72 and 10 CFR 50.73, the ECP Manager SHALL consult with a qualified site Senior Reactor Operator (SRO) to evaluate such implications in a timely manner.
- 5.6.3 In a like manner, security issues should be reported to the Security Force in a timely manner.
- 5.6.4 The determination to consult on such operability issues or security issues SHALL be at the discretion of the ECP Manager and SHALL be made in a conservative manner intended to assure compliance with operability, reportability, and Security Plan requirements.

## **5.7 APPEAL PROCESS**

- 5.7.1 IF an employee is dissatisfied with the resolution to a nuclear safety concern proposed by the Site ECP Manager, OR feels that an unresolved nuclear safety concern exists, THEN the CI may appeal the findings of the ECP investigation to the NSPM SCC Chairman (i.e., NSPM Chief Nuclear Officer).
- 5.7.2 The SCC SHALL then meet within ten business days to hear from the employee and attempt to resolve the appealed concern.
- 5.7.3 The SCC SHALL report on all appeals to the NSPM Chief Nuclear Officer.

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## **5.8 ASSISTANCE FROM NON-ECP PERSONNEL**

- 5.8.1** When concerns are raised to the ECP relating to security, wrongdoing, intimidation, harassment, discrimination or retaliation, the Site ECP Manager should engage the assistance, including referral for resolution from other company resources such as Human Resources, Security, Legal Counsel, and the Chief Nuclear Officer as appropriate.
- 5.8.2** The Site ECP Manager may, at his/her discretion, request the assistance of technical specialists from within or external to NSPM to assist with investigations, provide technical or other reviews, or provide independence from the concern. Consideration should be given to utilizing a Confidentiality Agreement in order to preserve sensitive information regarding the investigation. At a minimum, the ECP Manager will ensure that technical assistance personnel understand the sensitivity of the information and the need to maintain the information in confidence and secure from unauthorized access.
- 5.8.3** When nuclear safety concerns are referred to other groups for evaluation or resolution, the Site ECP Manager will remain the point of contact for the CI to obtain information regarding the status of the investigation.
- 5.8.4** When utilized by the Site ECP Manager or NSPM Fleet ECP Manager, Technical Specialists/Investigators may be provided with a written request or Charter for assistance. This request should provide:
1. The scope of the requested investigation.
  2. Relevant “need to know” information.
  3. Guidelines, as appropriate, for the conduct of the investigation.
  4. A list of deliverables and expected delivery dates.
  5. Other information as deemed appropriate by the Site ECP Manager or NSPM Fleet ECP Manager.
- 5.8.5** While conducting investigations for the Site ECP Manager or NSPM Fleet ECP Manager, Technical Specialists/Investigators SHALL report directly to the Site ECP Manager or NSPM Fleet ECP Manager respectively regarding issues related to the investigation.
1. The Technical Specialist/Investigators have no reporting responsibility to their normal line management with respect to the investigation. It is NOT generally appropriate or desirable that they communicate investigation status or findings to them.

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## 5.9 EXIT PROCESS

**5.9.1** Prior to departing an NSPM facility, all site workers should be provided with an opportunity to inform the Site ECP Manager or NSPM Fleet ECP Manager of any nuclear safety concerns.

1. This opportunity is implemented by utilizing either the ECP form “Nuclear Safety/Ethical Financial Practices Questionnaire” hard copy or equivalent, or the electronic form, or by setting-up an interview by contacting the Site ECP Manager or NSPM Fleet ECP Manager.
2. While it is optional for employees to utilize these methods, the employee’s responsible line manager should inform the employee of the opportunity to provide feedback to the ECP and the above available methods, prior to permitting the employee to depart the site.

## 5.10 PROCESSING OF NUCLEAR REGULATORY COMMISSION (NRC) REFERRAL OF “REQUEST FOR INFORMATION” LETTERS

<b>NOTE:</b>	The NSPM Fleet ECP Manager coordinates the response to an NRC Request for Information letter relating to Employee Concerns.
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**5.10.1** A technically competent and independent investigator SHALL be assigned to review the issue(s).

**5.10.2** When necessary, additional assistance from inside and/or outside NSPM should be obtained to investigate and generate a response to the referral letter.

**5.10.3** NRC Request for Information (RFI) letters and the NSPM response to the letters SHALL be controlled and limited.

1. The distribution of NRC RFI letters and the NSPM response to such letters is limited to personnel with a “need to know” and the following individuals (by position or equivalent):
  - NSPM Chief Nuclear Officer
  - Operations Senior Vice Presidents
  - Applicable Site Vice President
  - Vice President Operations Support
  - Xcel Energy Legal Counsel
  - Fleet ECP Manager
  - Site ECP Managers

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2. Email distribution of an NRC RFI letter and the NSPM response (including draft responses) includes the following header (or equivalent) at the beginning of the email. The header should be size 16 or 18 font, in red, to help ensure the header is noticeable.

Example:

THIS DOCUMENT CONTAINS SENSITIVE EMPLOYEE CONCERNS PROGRAM INFORMATION. YOU ARE ACCOUNTABLE TO RESTRICT DISTRIBUTION TO THOSE WITH A BUSINESS NEED AND CONTROL ACCESS TO THIS INFORMATION TO PREVENT UNINTENDED RELEASE.

THIS E-MAIL CONTAINS INFORMATION CLASSIFIED BY THE NRC AS "NEED TO KNOW" AND "NOT FOR PUBLIC DISTRIBUTION."

## **6.0 RECORDS**

- 6.1 Records generated through ECP activities SHALL be retained by the Site ECP Manager for a period of at least five years.
- 6.2 All ECP records SHALL be securely maintained as to protect the identity of confidential sources of information especially that of the Concerned Individual. The method of control SHALL be consistent with best industry practices.
- 6.3 Prior to destruction, ECP records SHALL require authorization from the NSPM Fleet ECP Manager and, at the direction of the NSPM Fleet ECP Manager, review by Xcel Counsel.

## **7.0 REFERENCES**

### **7.1 SOURCE DOCUMENTS**

1. NSPM Corporate Policy CP 0017, "Safety Culture"
2. 10 CFR 72.10, "Employee Protection"
3. Energy Reorganization Act of 1974, Section 211, "Employee Protection"
4. NRC Inspection Procedure 71152, "Identification and Resolution of Problems"
5. NEI 97-05, "Employee Concerns Program Process Tools in a Safety Conscious Work Environment"
6. NRC May 1996 Policy Statement, "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation"

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## **7.2 REFERENCE DOCUMENTS**

1. NSPM Corporate Policy CP 0021, "Employee Concerns Program"
2. 10 CFR 50.7, "Employee Protection"
3. 10 CFR 50.72, "Immediate Notification Requirements for Operating Nuclear Power Reactors"
4. 10 CFR 50.73, "License Event Report System"
5. FP-PA-ARP-01, "CAP Action Request Process"

## **7.3 COMMITMENTS**

None

## **8.0 REVISION SUMMARY**

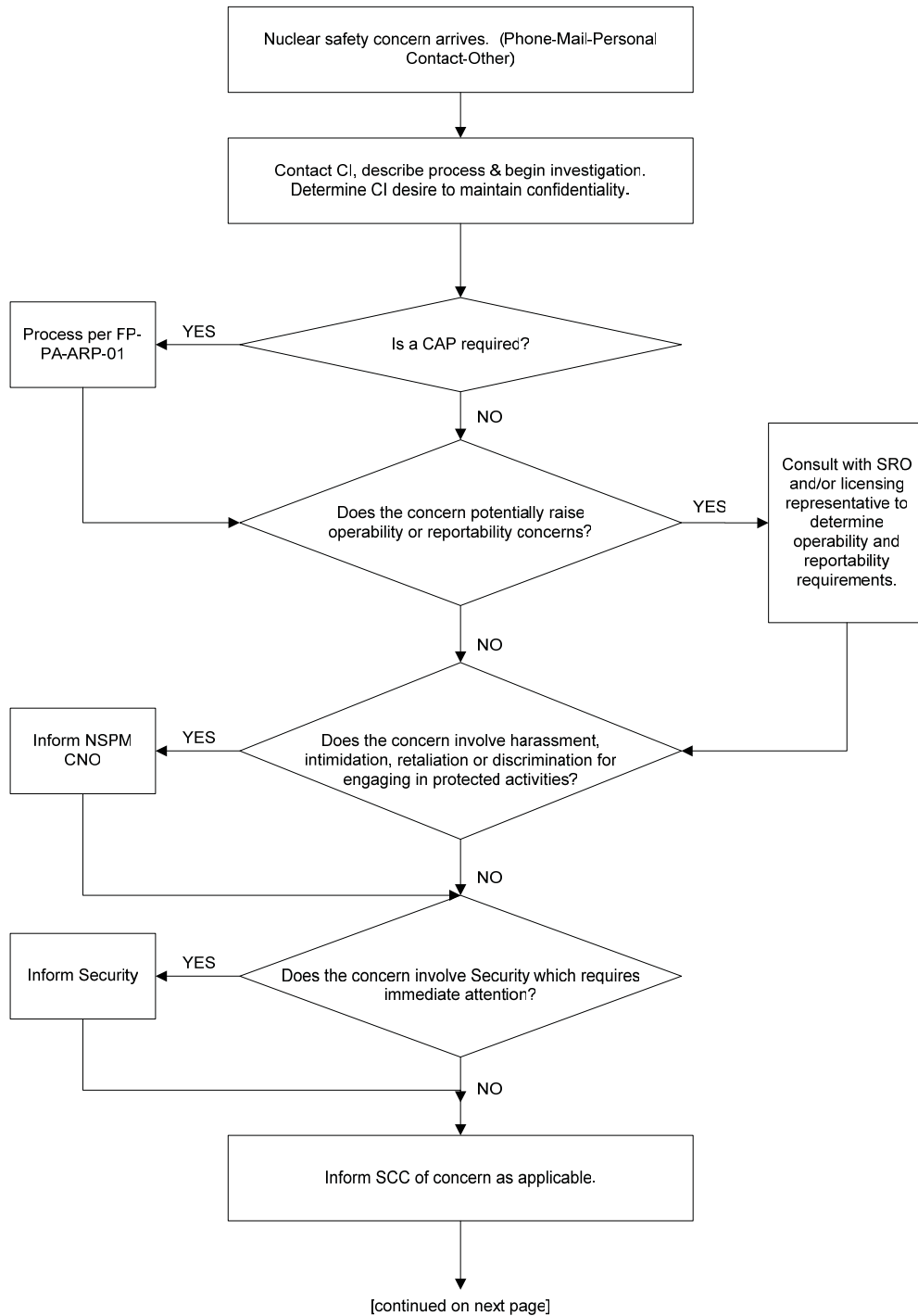
1. Added more direct guidance on writing CAPs.

## **9.0 ATTACHMENTS**

1. Attachment 1, Nuclear Safety Concern Resolution Flowchart
2. Attachment 2, Workplace Concern Resolution Flowchart

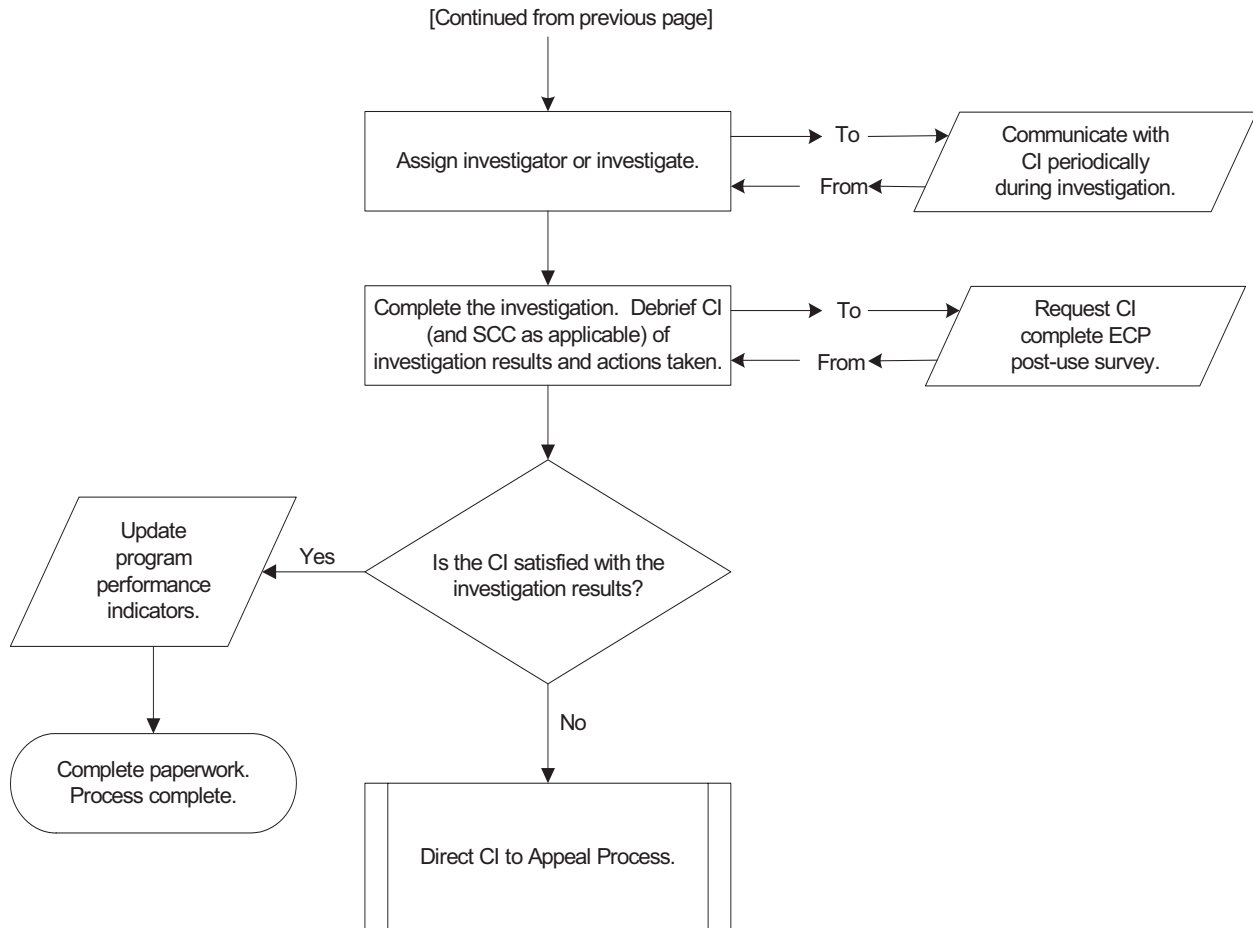
**ATTACHMENT 1**  
**NUCLEAR SAFETY CONCERN RESOLUTION FLOWCHART**

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**ATTACHMENT 1 (CONTINUED)**  
**NUCLEAR SAFETY CONCERN RESOLUTION FLOWCHART**

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## **ATTACHMENT 2**

### **WORKPLACE CONCERN RESOLUTION FLOW CHART**

